

SBK:WMP
F.#2009R00361

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

SAKA OLADEJO and
RASHIDAT OLADEJO,
also known as "Lisa Bailey"
and "Adekunbi Elizabeth Bailey,"

Cr. No. _____
(T. 18, U.S.C., §§ 371
and 3551 et seq.; T. 26,
U.S.C., § 7206(2))

Defendants.

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THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendants

1. The defendant SAKA OLADEJO was employed as a budget analyst for the New York City Administration for Children's Services/Head Start ("ACS/HS"). ACS/HS administered a publicly-funded childcare system, including the Head Start program which was a state and federally-funded, childhood development program for low income children. SAKA OLADEJO also owned and operated several sole proprietorships, including Ishaja Enterprises ("Ishaja"). Ishaja purportedly was engaged in several lines of business, including tax preparation, laundromat services and security services. SAKA OLADEJO was married to the

defendant RASHIDAT OLADEJO, also known as "Lisa Bailey" and "Adekunbi Elizabeth Bailey".

2. The defendant RASHIDAT OLADEJO, also known as "Lisa Bailey" and "Adekunbi Elizabeth Bailey," owned and operated Mosaic Co. ("Mosaic"), a sole proprietorship that purportedly provided interior design and construction services to Head Start Agency facilities, including facilities belonging to ACS/HS.

II. The Tax Fraud Scheme

3. For the 2003 and 2004 tax years, the defendants SAKA OLADEJO and RASHIDAT OLADEJO, also known as "Lisa Bailey" and "Adekunbi Elizabeth Bailey," filed a joint United States Individual Income Tax Return on Form 1040 with the United States Department of Treasury, Internal Revenue Service ("IRS") that identified Ishaja as the tax preparer (the "2003 Tax Return" and the "2004 Tax Return"). The 2003 Tax Return and the 2004 Tax Return each reported the profits of Mosaic and Ishaja on Form 1040, Schedules C.

4. In 2003 and 2004, Mosaic purportedly provided interior design and construction services to ACS/HS. Using the name "Lisa Bailey" and a social security number that differed from the social security number listed for the defendant RASHIDAT OLADEJO on the 2003 Tax Return and the 2004 Tax Return, the defendant RASHIDAT OLADEJO invoiced ACS/HS on behalf of Mosaic, and ACS/HS issued checks to "Lisa Bailey" in the amount of the

invoices. The defendants SAKA OLADEJO and RASHIDAT OLADEJO deliberately underreported their total income on the 2003 Tax Return and the 2004 Tax Return in that Mosaic's gross receipts listed on each Form 1040, Schedule C, did not include the full amount of money that ACS/HS paid to "Lisa Bailey" on behalf of Mosaic.

5. In 2003 and 2004, Ishaja purportedly provided security services to Mosaic. The defendant RASHIDAT OLADEJO, using the name "Lisa Bailey," issued checks to Ishaja as payment for these services. The defendants SAKA OLADEJO and RASHIDAT OLADEJO deliberately underreported their total income on the 2003 Tax Return and the 2004 Tax Return in that Ishaja's gross receipts listed on each Form 1040, Schedule C did not include the full amount of money that "Lisa Bailey" paid to Ishaja for security services.

COUNT ONE
(Conspiracy to Defraud the United States)

6. The allegations contained in paragraphs 1 through 5 are realleged and incorporated as though fully set forth in this paragraph.

7. In or about and between January 2003 and April 2005, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants SAKA OLADEJO and RASHIDAT OLADEJO, also known as "Lisa Bailey" and "Adekunbi Elizabeth Bailey," together with others, knowingly and

willfully conspired to defraud the United States by impeding, impairing, obstructing and defeating the lawful governmental functions of the IRS, in the ascertainment, computation, assessment and collection of revenue, specifically, federal income taxes.

8. In furtherance of the conspiracy and to effect its objectives, within the Eastern District of New York and elsewhere, the defendants SAKA OLADEJO and RASHIDAT OLADEJO, also known as "Lisa Bailey" and "Adekunbi Elizabeth Bailey," committed and caused to be committed, among others, the following:

OVERT ACTS

a. On or about July 17, 2004, SAKA OLADEJO and RASHIDAT OLADEJO caused the 2003 Tax Return to be filed with the IRS.

b. On or about April 15, 2005, SAKA OLADEJO and RASHIDAT OLADEJO each signed the 2004 Tax Return.

c. On or about April 15, 2005, SAKA OLADEJO and RASHIDAT OLADEJO caused the 2004 Tax Return to be filed with the IRS.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO
(Fraud and False Statement)

9. The allegations contained in paragraphs 1 through 5 are realleged and incorporated as though fully set forth in this paragraph.

10. On or about July 17, 2004, within the Eastern District of New York, the defendants SAKA OLADEJO and RASHIDAT OLADEJO, also known as "Lisa Bailey" and "Adekunbi Elizabeth Bailey," did knowingly and willfully aid and assist in, and procure, counsel and advise the preparation and presentation to the IRS, under the internal revenue laws of the United States, of a joint United States Individual Income Tax Return on Form 1040, including Schedules C, for the 2003 calendar year, which was false and fraudulent as to material matters, in that it contained false and deflated business income on Form 1040 and false and deflated gross receipts and sales on Form 1040, Schedules C, for Mosaic and Ishaja.

(Title 26, United States Code, Section 7206(2); Title 18, United States Code, Sections 3551 et seq.)

COUNT THREE
(Fraud and False Statement)

11. The allegations contained in paragraphs 1 through 5 are realleged and incorporated as though fully set forth in this paragraph.

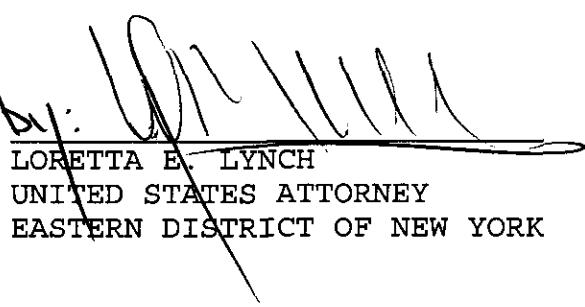
12. On or about April 15, 2005, within the Eastern District of New York, the defendants SAKA OLADEJO and RASHIDAT OLADEJO, also known as "Lisa Bailey" and "Adekunbi Elizabeth Bailey," did knowingly and willfully aid and assist in, and procure, counsel and advise the preparation and presentation to the IRS, under the internal revenue laws of the United States, of a joint United States Individual Income Tax Return on Form 1040, including Schedules C, for the 2004 calendar year, which was false and fraudulent as to material matters, in that it contained false and deflated business income on Form 1040 and false and deflated gross receipts and sales on Form 1040, Schedules C, for Mosaic and Ishaja.

(Title 26, United States Code, Section 7206(2); Title 18, United States Code, Sections 3551 et seq.)

A TRUE BILL



FOREPERSON



LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

INFORMATION SHEET

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

1. Title of Case: United States v. Saka Oladejo and Rashidat Oladejo, also known as
"Lisa Bailey" and "Adekunbi Elizabeth Bailey."

2. Related Magistrate Docket Number(s):

None (X)

3. Arrest Dates: N/A

4. Nature of offense(s): Felony
 Misdemeanor

5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the
Local E.D.N.Y. Division of Business Rules):

6. Projected Length of Trial: Less than 6 weeks (X)
More than 6 weeks ()

7. County in which crime was allegedly committed: Kings
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)

8. Has this indictment/information been ordered sealed? (X) Yes () No

9. Have arrest warrants been ordered? (X) Yes () No

10. Capital count included? () Yes (X) No

LORETTA E. LYNCH
UNITED STATES ATTORNEY

By:



Winston M. Paes
Assistant United States Attorney
718-254-6023